

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 22-CR-20114-KMW

UNITED STATES OF AMERICA

v.

CARLOS RAMON POLIT FAGGIONI,

Defendant.

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MOTION TO QUASH

The United States of America, by and through undersigned counsel, hereby moves to quash the writ issued in the above case for Juan Ribas Domenech and to release Mr. Ribas from the custody of the Bureau of Prisons where he is held on account of this writ.

On December 5, 2023, upon petition of the United States, Magistrate Judge Edwin Torres ordered a writ of *habeas corpus ad testificandum* for the testimony of Juan Ribas Domenech at trial in the above case. This writ is attached as Exhibit 1 (DE 114).

On February 23, 2024, Juan Ribas Domenech appeared before U.S. Magistrate Judge Jonathan Goodman relating to the writ. As explained in court, the United States respectfully moves to quash the above writ because the writ is no longer necessary to ensure the witness' appearance at trial in the above matter. As further explained, Mr. Ribas has completed his term of imprisonment in case 20-CR-20179-Gayles. He is presently in the custody of the Bureau of Prisons solely due to this writ and therefore the government further moves for Mr. Ribas's release from custody upon quashing of the writ.

Based on the foregoing, the United States respectfully requests an order quashing the writ issued at docket entry 114 and an order to release Mr. Ribas from custody of the Bureau of Prisons.

MARKENZY LAPOINTE
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CHIEF, FRAUD SECTION
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 23, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF thereby serving on counsel of record.

/s Michael N. Berger
Michael N. Berger
Assistant United States Attorney